

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:23-cv-00103-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF KRISTOPHER DAVIS IN SUPPORT OF PLAINTIFF
HEADWATER RESEARCH LLC'S RESPONSE IN OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS FOR LACK OF STANDING**

1. I, Kristopher Davis, declare as follows:

2. I am counsel for Headwater Research LLC (“Headwater”) in the above-captioned action. I provide this declaration in support of Headwater’s Response in Opposition to Defendants’ Motion to Dismiss for Lack of Standing. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

3. Exhibits 1-14 listed in the Table of Exhibits of Headwater’s Response were previously filed on October 25, 2024.

4. Attached as Exhibit 15 is a true and correct copy of an ItsOn presentation titled “Rewiring the Mobile Internet,” dated October 23, 2008.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 4, 2024 at Los Angeles, California

By: /s/ Kristopher Davis
Kristopher Davis

CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2024, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via email.

/s/ Kristopher Davis
Kristopher Davis